

ANN C. MOORMAN, ESQ. (CSB 130144)
LAW OFFICES OF ANN C. MOORMAN
308 S. School Street
Ukiah, California 95482
Telephone: (707) 462-1844
Facsimile: (707)468-0522

Attorney for Defendant
PHYLLIS REYES CUISON

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

No.: CR-06-0144 JSW

Plaintiff,

vs.

~~PROPOSED~~ ORDER AUTHORIZING
FOREIGN DEPOSITIONS UPON ORAL
EXAMINATION PURSUANT TO FED.
R. CRIM PRO. 15(a).

RENE MEDINA et al.,

Defendants

GOOD CAUSE HAVING BEEN SHOWN, and in light of the Court's receipt of signed declarations of Amelita Palmiano and Jessica Palmiano attesting to their respective intention to voluntarily appear for deposition upon oral testimony in the Republic of the Philippines, and this Court's Order dated October 31, 2006, the Court hereby Orders that such depositions go forward on the following terms and conditions:

A. The depositions upon oral examination of Amelita Palmiano and Jessica Palmiano shall commence on June 4, 2007 and continue until completion.

B. The depositions shall take place in the City of Manila or Makati within the Republic of the Philippines at a place agreed upon by all parties. Counsel for each defendant and counsel for the government shall each be provided an opportunity to orally examine

1 each witness during the deposition.

2 C. The deposition testimony shall be recorded by videotape and stenographic means as
3 authorized by Fed. R. Civ. P. 30(b)(2). Counsel for the defendants shall make
4 arrangement for both the videographer and stenographer. Transcripts of the depositions
5 upon oral examination shall be prepared in accordance with Fed. R. Civ. P. 30.

6 D. Objections shall be preserved in a manner consistent with Fed. R. Crim. P. 15(g)
7 and Fed. R. Civ. P. 30(c).

8 E. The parties agree to make available or produce to all other parties copies of all
9 documents or other tangible evidence expected to be shown to the deponent at the time
10 of the deposition whether or not introduction of the document into evidence is
11 anticipated. The parties agree to complete this exchange no less than seven calendar
12 days prior to the depositions commencing.

13 F. The witnesses are to produce at the depositions the following documents:

- 14 . 1.) Amelita Palmiano's banking records for all personal and business
15 accounts during 1998 through 2001, including statements and canceled
16 checks.
- 17 2.) All correspondence relating to the printing and mailing of the flyers by
18 Asian American Advertising for Lucky Chances Casino, including the
19 recipient mailing list for those flyers.
- 20 3.) Any and all original flyers of Asian American Advertising for Lucky
21 Chances Casino created and printed in the Philippines.
- 22 4.) All records regarding the disbursement of Asian American
23 Advertising funds directed by Amelita and/or Jessica Palmiano.
- 24 5.) All records related to Premier Printing
- 25 6.) All Asian America Advertising bank account records for the period
26 1998 through 2001, inclusive, including but not limited to statements and
27

1 canceled checks.

2 7.) Copies of canceled checks made payable to Premier Printing for
3 services rendered in connection with the flyers described in paragraphs 2
4 and 3 above.

5 8.) Any and all photographs of Cheun Leung.

6 9.) Any and all photographs of Julia Paco

7 10.) Any and all documents showing the original signature (or copy of
8 original signature) of Julia Paco.

9 11.) All documents showing the original signature (or copy of original
10 signature) of Cheun Leung.

11 12.) Any evidence to show that Cheun Leung and/or Julia Paco exist.

12 13.) Evidence tending to establish the source of the funds used by
13 Amelita Palmiano to purchase an interest in Casino Players

14 14.) A copy of Amelita Palmiano's tax return (filed in Philippines and US)
15 for 1998, 1999, 2000, 2001, 2002, 2003, 2004 and 2005.

16 15.) A copy of Jessica Palmiano's tax return (filed in Philippines and US) for
17 1998, 1999, 2000, 2001, 2002, 2003, 2004 and 2005.

18 16.) All records relating to Casino Players

19 17.) All records showing the disbursement of Casino Players funds -
20 directed by Amelita Palmiano.

21 18.) Lucky Delivery banking records for all bank accounts for the period
22 1998 through 2001, including but not limited to statements and canceled
23 checks.

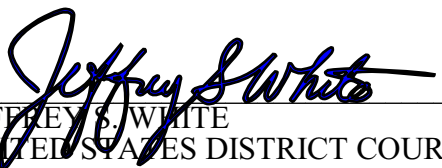
24 19.) All records related to any business owned by Amelita Palmiano and/or
25 Jessica Palmiano from 1998 to the present including documents filed
26 with the government.

- 20.) All records related to the payment of income and/or business taxes to the Philippine Government by Amelita Palmiano and/or Jessica Palmiano from 1998 to 2001.
- 21.) Documents relating to the acquisition and ownership of assets in the United States including brokerage account statements for Amelita Palmiano and for Jessica Palmiano.
- 22.) Documents related to the wire transfer of funds to Amelita Palmiano and Jessica Palmiano from the United States during the period from January 1, 1998 to December 31, 2001.
- 23.) Documents related to the wire transfer of funds by Amelita Palmiano and Jessica to the United States made during the period from January 1, 1998 to December 31, 2001.
- 24.) Current and cancelled passports (Philippine and US) and visa applications of Amelita Palmiano and Jessica Palmiano.
- 25.) All business licenses acquired by Amelita Palmiano and/or Jessica Palmiano.

G. Amelita Palmiano and Jessica Palmiano are directed to provide writing exemplars to the Government at their respective depositions.

IT IS SO ORDERED.

April 20, 2007


JEFFREY S. WHITE
UNITED STATES DISTRICT COURT